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November 12, 2019

Via ECF and Facsimile

Hon. Alvin K. Hellerstein, USDJ
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1050
New York, NY 10007

Re: *In the Matter of the Application of Orly Genger*, Case No. 19-cv-9319-AKH and
In the Matter of the Petition of Dalia Genger, Case No. 19-cv-9365-AKH

Dear Judge Hellerstein:

In the above-referenced actions – which were removed to this Court in connection with a Chapter 7 bankruptcy proceeding filed in the Western District of Texas – we request, as officers of the court, a 45-day extension of time to respond to the pending motions to remand.

We acted as counsel to the original bankruptcy trustee in removing these actions. In the interim, last week on November 5, the bankruptcy court transferred venue of the bankruptcy case to New York. As a consequence of that order, a new bankruptcy trustee must be appointed. During the interregnum, the Debtor's estate is unable to respond to the remand motions until a new trustee is appointed. Likewise, given the ordered change in venue, the previously filed motions to transfer the removed cases to Texas are moot, but any motion or stipulation in that regard also must await appointment of the new trustee. Thus, for the sake of orderly procedure, an extension of the deadlines is warranted so that the new trustee can make an informed decision. Because nothing can occur in these actions – whether remanded or not – until a new trustee is appointed to steward these cases, the requested adjournment will not prejudice any party.

Counsel for movants nevertheless object to this request for an extension. There have been no prior requested deadline extensions related to the pending remand motions.

Respectfully submitted,

/s/ Michael Paul Bowen

cc: all counsel of record (via email)